

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**CRCC COMMERCIAL VENTURES  
LLC**

*Plaintiff,*

vs.

**PACIFIC EMPLOYERS INSURANCE  
COMPANY**

*Defendant.*

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**CIVIL ACTION NO. 7:25-cv-320**

**DEFENDANT’S NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendant Pacific Employers Insurance Company (“Pacific”) files this Notice of Removal and respectfully shows that diversity subject-matter jurisdiction exists and removal is timely.

**I.  
REMOVAL IS TIMELY**

1. On May 22, 2025, Plaintiff filed its Original Petition in the matter styled *CRCC COMMERCIAL VENTURES LLC*, Cause No. C-2466-25-C, in the 139th District Court of Hidalgo County, Texas.

2. Pacific only received notice of this lawsuit on June 03, 2022.

3. Under federal law, “notice of removal of a civil action or proceeding shall be filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based ....” 28 U.S.C. § 1446(b)(1).

4. Pacific files this Notice of Removal within the thirty-day time period. *See* 28 U.S.C. § 1446(b). Accordingly, removal of this action is timely.

**II.**  
**DIVERSITY OF CITIZENSHIP**

5. Removal is proper under 28 U.S.C. § 1332(a)(1), because there is currently complete diversity of citizenship, and complete diversity existed on the date the state court case was filed.

6. Plaintiff is a limited liability company doing business in the State of Texas, with its principal place of business in Hidalgo County, Texas. Therefore, Plaintiff is a citizen of the State of Texas.

7. Pacific is an insurance company incorporated in the Commonwealth of Pennsylvania, with its principal place of business in the Commonwealth of Pennsylvania. Therefore, Pacific is a citizen of the Commonwealth of Pennsylvania.

8. There is diversity of citizenship.

**III.**  
**VENUE IS PROPER**

9. Venue is proper in the United States District Court for the Southern District of Texas, McAllen Division, under 28 U.S.C. §§ 124 and 1446, since it is the district and division within which such action is pending in state court.

**IV.**  
**AMOUNT IN CONTROVERSY**

10. The amount in controversy exceeds the \$75,000.00 threshold required to invoke this Court's jurisdiction. 28 U.S.C. § 1332(a).

11. In its Original Petition, Plaintiff seeks "monetary relief of \$250,000 or less" (Pl.'s Pet. ¶ 4.)

12. The amount in controversy clearly exceeds \$75,000.00.

**V.**

**REMOVAL IS PROCEDURALLY CORRECT**

13. Pursuant to 28 U.S.C. § 1446(a), attached hereto is:
  - a. All process in the case (**Exhibit A**)
  - b. Pleadings asserting causes of action, *e.g.*, petitions, counterclaims, cross actions, third-party actions, interventions and all answers to such pleadings (**Exhibits B and C**);
  - c. All orders signed by the state judge (None);
  - d. The docket report (**Exhibit D**);
  - e. An index of all matters being filed (**Exhibit E**); and
  - f. A list of all counsel of record, including addresses, telephone numbers and parties represented (**Exhibit F**).
14. Pursuant to 28 U.S.C. § 1446(d), promptly after Pacific files this Notice of Removal, written notice of the filing will be given to Plaintiff.
15. Pursuant to 28 U.S.C. § 1446(d), promptly after Pacific files this Notice of Removal, a true and correct copy will be filed with the District Clerk of Hidalgo County, Texas.

**VI.**

**CONCLUSION**

WHEREFORE, Pacific respectfully requests that this action now pending in Hidalgo County, Texas be removed to the United States District Court for the Southern District of Texas, McAllen Division, and for the Court to grant Pacific any such other and further relief to which it may be justly entitled, at law or in equity.

COZEN O'CONNOR



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**ATTORNEYS FOR DEFENDANT**

**PACIFIC EMPLOYERS INSURANCE COMPANY**

**CERTIFICATE OF SERVICE**

This certifies that, on June 23, 2022 of the foregoing was served on the following counsel of record pursuant to the Federal Rules of Civil Procedure.

Maria Gerguis

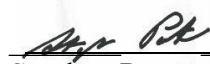
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